

In Re: Jeramy P. Cox : Bankruptcy No. 4:18-bk-05300-MJC  
Debtor : Chapter 13

**MOTION TO REOPEN DEBTORS CHAPTER 7 CASE TO FILE  
CERTIFICATION REGARDING DOMESTIC SUPPORT OBLIGATIONS**

AND NOW, comes the Debtor, Jeramy P. Cox, by and through counsel, who pursuant to Federal Rule of Bankruptcy Procedure 5010, hereby moves this Honorable Court to Reopen the above-captioned matter for the purpose of entering a Discharge and in support thereof avers as follows:

1. The Debtor, Jeramy P. Cox, (hereinafter collectively referred to as the “Debtor”), commenced the above captioned matter by filing a Voluntary Petition pursuant to Chapter 13 of the United States Bankruptcy Code on December 20, 2018.
2. On January 19, 2023, the Chapter 13 Trustee, Jack N Zaharopoulos, Esq., filed a Determination that plan payments were completed (Docket No. 64).
3. The Bankruptcy Estate has been fully administered.
4. On February 17, 2023, the Clerk of this Honorable Court provided notice to the Debtor that no discharge would be entered unless they filed a Certification Regarding Domestic Support Obligations, which is known as Official Form 2830 for Chapter 13 cases. (Docket No. 67).
5. On March 23, 2023, this Honorable Court closed the above-captioned matter without issuing a discharge because the Debtors did not file a Certification Regarding Domestic Support Obligations. (Docket No. 74)
6. On May 30, 2023, the Debtor, by and through the undersigned, filed Certification Regarding Domestic Support Obligations. (Docket No. 77).
7. The Debtors Certification Regarding Domestic Support Obligations were not filed through an oversight of the undersigned’s office.

8. It would be unjust to deny the Debtor a Discharge based upon the foregoing.

WHEREFORE, the Debtor respectfully prays that this Honorable Court grant the within Motion and reopen the above-captioned case for the purposes of a Discharge being entered,

Respectfully Submitted:

Dated: May 30, 2023

/s/ Erik M. Helbing  
Erik M. Helbing, Esq.  
I.D. No. 203832  
Bowe & Odorizzi Law  
109 W. Broad Street  
Tamaqua, PA 18252-1916  
(570) 668-1241 Phone  
(570) 371-5445 Fax

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re: Jeramy P. Cox : Bankruptcy No. 4:18-bk-05300-MJC  
: Chapter 13  
Debtor

## CERTIFICATE OF SERVICE

I, Erik M. Helbing, attorney for the debtor, hereby certify a true and correct copy of the above and foregoing document was served on this 30<sup>th</sup> day of May 2023 to all affected creditors and parties in interest not receiving electronic notification.

/s/ Erik M. Helbing  
Erik M. Helbing  
Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re: Jeffrey L. Erie

Debtor

: Bankruptcy No. 5:22-bk-02375-MJC  
: Chapter 7

**ORDER GRANTING MOTION TO REOPEN CASE TO FILE  
CERTIFICATION REGARDING DOMESTIC SUPPORT OBLIGATIONS**

UPON CONSIDERATION OF THE FOREGOING MOTION, it is hereby Ordered that the Final Decree without a discharge filed on March 23, 2023, is vacated and the case shall be **REINSTATED** and that the Order vacating the Automatic Stay filed on March 23, 2023, is vacated and the automatic stay is **REINSTATED**.

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DATE

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UNITED STATES BANKRUPTCY JUDGE